

# WINDELS MARX

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January 5, 2022

*Via ECF*

Honorable Madeline Cox Arleo  
United States District Judge  
Martin Luther King, Jr. Federal  
Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**RE: United States v. Paul Parmar, Criminal No. 2:18-cr-00735-MCA**  
**Request to Adjourn Scheduled Oral Argument and Trial**

Dear Judge Arleo:

I am writing to respectfully request an adjournment of the oral argument and hearing dates set by this Court on November 17, 2021. This request is being made after discussion with and with the consent of the Government and counsel for the co-defendant.

As this Court has previously noted, this matter is a complex case within the meaning of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii). The parties have completed discovery and have fully briefed motions, and this Court set January 13, 2022 as the date for oral argument of issues raised in those motions. Unfortunately, Mr. Parmar – who has been undergoing medical testing for neurological issues as previously revealed to this Court – was exposed to and contracted Covid, probably during one of his visits to a medical

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facility. Mr. Parmar has thus been essentially unavailable to participate in meeting with his legal team in preparation for the scheduled oral argument. In light of Mr. Parmar's medical condition, the Government has consented to an adjournment of four weeks for oral arguments. This would move the oral argument date from January 13, 2022, to February 10, 2022. This date is acceptable to both defendants and to the Government if it is acceptable to this Court.

Further, this Court's Order set February 15, 2022, as the date for trial, with the viability of that date to be revisited during the oral arguments. Based on the parties' request to adjourn the oral argument, we respectfully request an adjournment of four months for the trial date. This request takes into account Mr. Parmar's current Covid status, as well as his ongoing underlying medical condition which has not yet been fully diagnosed and for which a comprehensive treatment plan is still outstanding. The request also takes into account the complexity of preparing this matter for trial, as well as ongoing review of the productions received as a result of the subpoenas requested by Mr. Parmar and ordered by this Court, and the ongoing restrictions on Court facilities imposed by the Covid pandemic. I have spoken with counsel for the Government and for Pavandeep Bakhshi, and have been assured that both parties consent to this adjournment and that June 27, 2022 is an acceptable date for all parties for the trial to commence. It is my hope that an adjournment of this length will allow for a resolution of Mr. Parmar's medical issues, although the lack of a definitive diagnosis prevents me from making a clear assertion to that effect.

Defendant Parmar accordingly seeks an adjournment of the oral argument and trial dates as set forth above, moving the argument to February 10, 2022 and the trial to June 27, 2022.

Respectfully submitted,

*/s/ Jeffrey Hoffman*

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